

June 9, 2003

Jeffrey M. Bernstein, Esq.
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Attorneys at Law
585 Boylston Street, Suite 400
Boston, MA 02116

Re: Cape Light Compact, D.T.E. 03-39

Dear Mr. Bernstein:

Enclosed please find the Department of Telecommunications and Energy's first set of information requests to Cape Light Compact in the above-captioned matter. Due to clerical error, this set is intended to amend and replace the set issued on May 29, 2003 in its entirety. Please submit responses on or before Wednesday, June 18, 2003. If you have any questions regarding these requests, please contact me at (617) 305-3624.

Thank you for your prompt attention to this matter.

Sincerely,

Kevin F. Penders
Hearing Officer

Enc.

cc: Mary L. Cottrell, Secretary
Joseph Rogers, Esq., Office of the Attorney General

**FIRST SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
CAPE LIGHT COMPACT, D.T.E. 03-39**

INSTRUCTIONS

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to the Cape Light Compact the following Information Requests with respect to the above captioned matter. The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department in this proceeding.

1. The "Compact" means the Cape Light Compact, acting on behalf of the Towns of Aquinnah, Barnstable, Bourne, Brewster, Chatham, Chilmark, Dennis, Eastham, Edgartown, Falmouth, Harwich, Mashpee, Oak Bluffs, Orleans, Provincetown, Sandwich, Tisbury, Truro, Wellfleet, West Tisbury, Yarmouth, and the Counties of Barnstable and Dukes.
2. "Compact Filing" or "Filing" means all the documents the Compact filed in this proceeding.
3. "Plan" means the document entitled, "The Cape Light Compact Energy Efficiency Plan, Phase II: 2003-2007" (Filing at Tab 1).
4. Each request should be answered in writing on a separate three-hole punched page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
5. Please do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
6. These requests shall be deemed continuing so as to require further supplemental responses if Cape Light Compact ("Compact") or its witnesses receive or generate additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
7. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.

8. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
9. If the Compact finds that any one of these requests is ambiguous, please notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
10. A copy of all responses should be served to Mary L. Cottrell, Secretary of the Department. Additional copies should also be served directly to: (1) Kevin Penders, Legal Division; (2) Gene Fry, Electric Power Division; and (3) Robert Harrold, Electric Power Division.

**FIRST SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
CAPE LIGHT COMPACT, D.T.E. 03-39**

- DTE-1-1 Please refer to the Filing, Tab 4 at 4. Provide current statistics regarding the current amount of customers receiving Default Service from the Compact on the Cape and Vineyard.
- DTE-1-2 Please refer to the Plan at 8. Explain why the Plan includes incentives for non-electric energy end-uses.
- DTE-1-3 Please refer to the Plan at 10. Explain the reasons for increasing the eligibility threshold for low-income programs as well as the reasons for selecting 60 percent as the new eligibility threshold.
- DTE-1-4 Please refer to the Plan at 13. The Compact indicates that “[w]here possible” non-electric resource savings, customer benefits, and benefits associated with low-income programs have been included. Indicate where such benefits have not been included and indicate which programs are specifically affected.
- DTE-1-5 Please refer to the Plan at 14. The Compact indicates that the estimated benefits in Table 2.4 do not include post-program effects. In the Filing, Tab 3 at 5, the Compact indicates that the impacts of program spillover and market transformation are not included. Explain whether inclusion of such effects would have a major impact on the benefits for the New Construction Demo program? If yes, discuss.
- DTE-1-6 Please refer to the Plan at 14. At 0.55, the B/C ratio for the New Construction Demo Program is one of the lower B/C ratios in the Plan. Has the Compact examined ways in which this B/C ratio might be increased? If yes, explain.
- DTE-1-7 Please refer to the Plan at 40. At 1.18, the B/C ratio of the Low Income Single-Family Program is one of the lower B/C ratios in the Plan. Has the Compact examined ways in which the B/C ratio of this program may be increased? If yes, explain.
- DTE-1-8 Please refer to the Plan at 40. At 249 megawatt hours, the Annual Energy Savings of the Low Income Single-Family Program is one of the lower annual energy savings amounts in the Plan. Has the Compact examined ways in which the annual energy savings of this program may be increased? If yes, explain.
- DTE-1-9 Please refer to the Plan at 42. Please explain how a HERS score is calculated.
- DTE-1-10 Please refer to the Plan at 43. At 1.17, the B/C Ratio of the Low-Income New Construction Program is one of the lower B/C ratios in the Plan. Has the

Compact examined ways in which the B/C ratio of this program may be increased? If yes, explain.

DTE-1-11 Please refer to the Plan at 43. The Annual Energy Savings of the Low Income New Construction Program is one of the lower annual energy savings amounts in the Plan. Has the Compact examined ways in which the annual energy savings of this program may be increased? If yes, explain.

DTE-1-12 Please refer to the Plan at 27. The Annual Energy Savings of the Residential New Construction Demo Project is one of the lower annual energy savings amounts in the Plan. Has the Compact examined ways in which the annual energy savings of this program may be increased? If yes, explain.